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June 3, 2016

BY ECF

The Honorable J. Paul Oetken
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**Letter Motion for Order Extending Defendant's Time to Respond to Complaint
in *Leontiev v. Varshavsky*, No. 1:16-cv-03595-JPO**

Dear Judge Oetken:

We are counsel to defendant Alexander Varshavsky in the above-captioned action. We write to request, with the consent of counsel for plaintiff Sergey Leontiev, an extension of defendant's time to respond to the Complaint, from the current deadline of June 16, 2016 until July 29, 2016. We have accepted service of the Summons and Complaint on behalf of Mr. Varshavsky and Mr. Varshavsky has agreed to waive any defense of insufficient process or insufficient service of process. This is the first request for such an extension.

Respectfully submitted,

/s/ Sean Hecker

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